

EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

ADJUSTACAM LLC

Plaintiff

v.

AMAZON.COM, INC. *et al.*,

Defendants

Case No. 6:10-cv-329-LED

JURY TRIAL DEMANDED

DEFENDANTS' P.R. 4-2 DISCLOSURE

Pursuant to Rule 4-2 of the Patent Rules for Patent Cases before the Eastern District of Texas (“Patent Rules” or “P.R.”) and the Court’s May 26, 2011 Docket Control Order, defendants Amazon.com, Inc., Auditek Corporation, Best Buy Co. Inc., Best Buy Stores, LP, Bestbuy.Com, CDW LLC¹, CompUSA.com, Inc., Dell, Inc., Digital Innovations, LLC, Fry’s Electronics, Inc., Gear Head, LLC, Hewlett-Packard Company, J&R Electronics, Inc., d/b/a J&R, Kohls Corporation, and Kohl’s Illinois, Inc., Macally Peripherals, Inc., Mace Group, Inc., Micro Electronics, Inc. d/b/a Micro Center, New Compusa Corporation, Newegg, Inc., Newegg.Com, Inc., Office Depot, Inc., Rosewill Inc., Sakar International, Inc., Systemax, Inc., Target Corporation, Tigerdirect, Inc., and Wal-Mart Stores, Inc., LLC, (collectively, “Defendants”), propose that the following claim terms, phrases or clauses should be construed by the Court as follows:

¹ On December 31, 2009, “CDW Corporation” merged into CDWC LLC, an Illinois limited liability company, and the name of CDWC LLC was changed to “CDW LLC” as of that date.

Claims	Claim Term/Phrase/Clause	Proposed Construction
1, 8, 19	Hinge member	Structural element that may be joined to another so as to form a hinge joint and is capable of rotating on that hinge joint
1, 19	Axis of rotation	Plain meaning
1, 8, 19	Support frame	A physically distinct structural element attached to the hinge member so as to form a hinge joint, that can take different dispositions via rotation about said hinge joint
1, 19	Rotatably attached	Connected such that the connected object is capable of being adjusted to different configurations via motion over one axis of rotation
1, 19/8	Adapted to be rotatably attached/ Adapted to rotatably attach	Formed in a manner to allow an object connected thereto to be adjusted to different configurations via movement over one axis of rotation
1	Disposition	Configuration of the support frame relative to the hinge member accomplished through rotation about the second axis, enabling support of the hinge member on a surface or edge
1	Maintained adjacent said edge	Positioned near said edge without engaging or contacting the edge
1	When said first surface and said second surface are inclined from a generally horizontal orientation	When the object upon which the claimed apparatus rests is not generally horizontal but inclined from the horizontal
19	A display screen which can be inclined from a generally horizontal position	A display screen that may be adjusted from a generally horizontal position to a non-horizontal position
8	body	One unitary structural element
8	Proximal...end	One end of the hinge member, distinct from the distal end
8	Distal end	Other end of the hinge member distinct from the proximal end
8	Hingedly attaching	Connected or joined via a hinge joint so as to allow swinging motion about said hinge joint
8	Pivot element	One unitary structural element around which an attached camera rotates
19	Rotation of said support frame being prevented along an axis substantially parallel	The support frame, or portions thereof, is prevented from moving about the second axis, and thus remains in one particular disposition relative to said second axis
19	Engagingly support	Maintained in a stable position relative to an object by the support frame via physical contact between the support frame and said object

DATED: October 28, 2011

By: /s/ Steven R. Daniels

W. Bryan Farney
Lead Attorney
Texas State Bar No. 06826600
Steven R. Daniels
Texas State Bar No. 24025318
Bryan D. Atkinson
Texas State Bar No. 24036157
FARNEY DANIELS LLP
800 S. Austin Ave., Suite 200
Georgetown, Texas 78626
Telephone: (512) 582-2828
Facsimile: (512) 582-2829
E-mails:
BFarney@farneydaniels.com
SDaniels@farneydaniels.com
BAtkinson@farneydaniels.com

ATTORNEYS FOR DEFENDANTS
CDW, INC., CDW CORPORATION,
CDW LLC, CREATIVE LABS, INC.,
FRY'S ELECTRONICS INC.,
HEWLETT-PACKARD COMPANY,
MICROCENTER ELECTRONICS,
INC., OFFICE DEPOT, INC., TARGET
CORPORATION, BEST BUY CO. INC.,
BEST BUY STORES, LP, AND
BESTBUY.COM, LLC

By: /s/ Eric H. Findlay

Eric H. Findlay
State Bar No. 00789886
Brian Craft
State Bar No. 04972020
Findlay Craft, LLP
6760 Old Jacksonville Hwy
Suite 101
Tyler, TX 75703
(903) 534-1100
(903) 534-1137 FAX
efindlay@findlaycraft.com
bcraft@findlaycraft.com

James E. Geringer (pro hac vice)
james.geringer@klarquist.com
Salumeh R. Loesch
salumeh.loesch@klarquist.com
KLARQUIST SPARKMAN, LLP
121 S.W. Salmon Street, Suite 1600
Portland, Oregon 97204
Telephone: (503) 595-5300
Facsimile: (503) 595-5301
ATTORNEYS FOR DEFENDANT
AMAZON.COM, INC.

By: /s/ Jen-Feng Lee

Jen-Feng Lee (pro hac vice)
LT Pacific Law Group LLP
17800 Castleton Street, Suite 383
City of Industry, CA 91748
Tel: (626) 810-7200
Fax: (626) 810-7300
Email: jflee@ltpacificlaw.com

**ATTORNEYS FOR DEFENDANT
AUDITEK CORPORATION**

By: /s/ David W. Denenberg

David W. Denenberg (pro hac vice)
Davidoff Malito & Hutcher LLP
200 Garden City Plaza
Garden City, New York 11530
(516) 247-4440 (Telephone)
(516) 248-6422 (Facsimile)
dwd@dmlegal.com

**ATTORNEYS FOR DEFENDANTS
SYSTEMAX, INC., COMPUSA.COM,
INC., NEW COMPUSA
CORPORATION, AND TIGERDIRECT,
INC.**

By: /s/ Roger Fulghum

Scott F. Partridge
Lead Attorney
Texas State Bar No. 00786940
Roger Fulghum
Texas State Bar No. 00790724
BAKER BOTTS L.L.P.
One Shell Plaza
910 Louisiana Street
Houston, Texas 77002-4995
Telephone: (713) 229-1569
Facsimile: (713) 229-7769
E-mail:
scott.partridge@bakerbotts.com
E-mail:
roger.fulghum@bakerbotts.com

Paula D. Heyman
Texas State Bar No. 24027075
BAKER BOTTS L.L.P.
98 San Jacinto Boulevard
Suite 1500
Austin, Texas 78701-4078
Telephone: (512) 322-2555
Facsimile: (512) 322-3610
E-mail:
paula.heymann@bakerbotts.com

**ATTORNEYS FOR DEFENDANT
DELL INC.**

By: /s/ Phillip B. Philbin

Phillip B. Philbin
phillip.philbin@haynesboone.com
Texas State Bar No. 15909020
HAYNES AND BOONE, L.L.P.
2323 Victory Avenue, Suite 700
Dallas, Texas 75219
Tel: 214-651-5000
Fax: 214-651-5940

Of Counsel:

Kenneth K. Dort
kdort@mcguirewoods.com
Gary Y. Leung
gleung@mcguirewoods.com
MCGUIREWOODS LLP
77 W. Wacker Dr. Ste. 4100
Chicago, IL 60601-1818
312.849.8100
312.849.3690 (fax)

**ATTORNEYS FOR DEFENDANT
DIGITAL INNOVATIONS, LLC**

By: /s/ Herbert J. Hammond

Herbert J. Hammond
Attorney-In-Charge
State Bar No. 08858500
Vishal Patel
State Bar No. 24065885
THOMPSON & KNIGHT LLP
One Arts Plaza
1722 Routh St., Suite 1500
Dallas, Texas 75201
(214) 969-1700
(214) 969-1751 (Fax)

Patricia L. Davidson
MIRICK, O'CONNELL,
DEMALLIE & LOUGEE, LLP
100 Front Street
Worcester, Massachusetts 01608-
1477
(508) 860-1540
(508) 983-6240 (Fax)

**ATTORNEYS FOR DEFENDANT
GEAR HEAD, LLC**

By: /s/ Peter M. Lukevich

Attorney at Law
APEX JURIS, PLLC
12733 Lake City Way NE
peter@apexjuris.com
Seattle, WA 98125
Telephone: (206) 664.0314
Facsimile: (206) 664.0329

**ATTORNEYS FOR DEFENDANTS
MACALLY PERIPHERALS, INC.
D/B/A MACALLY U.S.A AND MACE
GROUP, INC.**

By: /s/ Trey Yarbrough

Trey Yarbrough
State Bar No. 22133500
Debby E. Gunter
State Bar No. 24012752
Yarbrough Wilcox, PLLC
100 E. Ferguson St., Ste. 1015
Tyler, Texas 75702
(903) 595-3111 Telephone
(903) 595-0191 Facsimile
E-mail: trey@yw-lawfirm.com
debby@yw-lawfirm.com

Of Counsel:
Christopher J. Cuneo
Zarian Midgley & Johnson PLLC
960 Broadway, Suite 250
Boise, Idaho 83706
(208) 562-4900 Telephone
(208) 562-4901 Facsimile
E-mail: Cuneo@zarianmidgley.com

**ATTORNEYS FOR DEFENDANTS
NEWEGG, INC., NEWEGG.COM,
INC., AND ROSEWILL INC.**

By: /s/ Victor de Gyarfas

Victor de Gyarfas
Texas Bar No. 24071250
e-mail: vdegyarfasi@foley.com
FOLEY & LARDNER LLP
555 South Flower Street, Suite 3500
Los Angeles, CA 90071-2411
213.972.4500
213.486.0065

**ATTORNEYS FOR DEFENDANT
WAL-MART STORES, INC.**

/s/ Michael E. Jones

Michael E. Jones
State Bar No. 10929400
mikejones@potterminton.com
Allen F. Gardner
State Bar No. 24043679
allengardner@potterminton.com
Daniel A. Noteware, Jr.
State Bar No. 24051123
dannynoteware@potterminton.com
POTTER MINTON
A Professional Corporation
110 N. College Ave., Suite 500
Tyler, Texas 75702
Tel: (903) 597-8311
Fax: (903) 593-0846

**ATTORNEYS FOR DEFENDANT J&R
ELECTRONICS INC.**

By: /s/ Ezra Sutton

EZRA SUTTON, Esq. (pro hac vice)
EZRA SUTTON, P. A.
Plaza 9, 900 Route 9
Woodbridge, New Jersey 07095
Tel: 732-634-3520
Fax: 732-634-3511
Email: esutton@ezrasutton.com
**ATTORNEYS FOR DEFENDANTS
SAKAR INTERNATIONAL, INC.,
KOHL'S CORPORATION, and
KOHL'S ILLINOIS, INC.**

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this notice was served on all counsel who have consented to electronic service, Local Rule CV-5(a)(3)(A), on this the 28th day of October, 2011.

/s/ Steven R. Daniels
Steven R. Daniels